



Joseph B. Burns
E-mail: jburns@rms-law.com
Phone: (860) 493-3410

One State Street Hartford, CT 06103
phone 860.549.1000 fax 860.724.3921
www.romemcguigan.com

April 1, 2020

VIA ECF

Judge I. Leo Glasser
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Zsa Zsa Jewels, Inc. v. BMW of North America, LLC et. al
Case No. 1:15-cv-06519-ILG-RLM

Dear Judge Glasser:

Today plaintiff Zsa Zsa Jewels, Inc., has filed its Second Amended Complaint, pursuant to Fed.R.Civ.P. Rule 15(a)(2) with the consent of the defendant, BMW of North America, LLC ("BMW"), as well as Plaintiff's Notice of Motion to Reopen Discovery and supporting memorandum of law.

Pursuant to Section IV of the Your Honor's Individual Rules concerning motions practice, and after consultation with Attorney Joseph Kim, counsel for BMW, the parties propose the following briefing schedule for your consideration and endorsement:

- BMW's opposition to Motion to Reopen Discovery to be filed within 45 days, or May 18, 2020
- Plaintiff's reply memorandum to be filed within 10 days of BMW's opposition, or May 28, 2020

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "JBB".

Joseph B. Burns

JBB/exp

cc: Counsel of Record via ECF

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